

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America

v.

Jerome Lamont Duggan, a/k/a "Rome," Larry
Haywood Culbreath, Jr., a/k/a "Harlem," Erik Ryan
Boehm, a/k/a "Rock," a/k/a "Rocky," a/k/a "Rocco"

)

Case No. 16-559-1-3

*Defendant(s)***FILED****MAY 05 2016****MICHAEL E. KUNZ, Clerk**
By _____
Dep Clerk**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 18, 2016 through May 4, 2016 in the county of Lehigh and Northampton in the
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*Title 21, United States Code
Section 846, 841(a)(1),(b)(1)(A).Between April 18, 2016 and May 4, 2016, in Allentown and Bethlehem, in the
Eastern District of Pennsylvania, defendants Jerome Lamont Duggan, Larry
Haywood Culbreath, Jr., and Erik Ryan Boehm conspired and agreed with
others known and unknown, to knowingly and intentionally distribute 500
grams or more of a mixture and substance containing a detectable amount of
methamphetamine, a Schedule II controlled substance, in violation of 21
U.S.C. § 846, 841(a)(1), (b)(1)(A).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

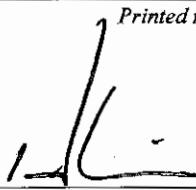

Complainant's signature

Joshua B. Romig, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/05/2016


Judge's signature

City and state: Allentown, PA

The Hon. Henry S. Perkin, U.S. Magistrate Judge

Printed name and title

16e-559-1-3

AFFIDAVIT

I, Joshua B. Romig, having been duly sworn, depose and state the following:

1. I am a Special Agent with the Drug Enforcement Administration where I have been employed for 8 years. I am currently assigned to the Philadelphia Division, Allentown Resident Office. Prior to that, beginning in August 1999, I was a law enforcement officer specializing in narcotics-trafficking cases, in both Baltimore, Maryland and Reading, Pennsylvania.

2. As a result of my training and experience, I am familiar with the federal narcotics laws with respect to which I have enforcement authority.

3. The information contained in this affidavit is based on my personal participation as the lead investigator in this case, my review of court and law enforcement records and reports related to this investigation and my interviews with arrestees, informants and law enforcement officers involved in this investigation.

Background of Defendants

4. Larry Haywood Culbreath, Jr., a/k/a "Harlem," (hereinafter "Culbreath,") uses telephone (484) 626-6421 and has a date of birth of [REDACTED], Social Security numbers ***-**-2289 and ***-**-7289, and a home address of 1246 Walnut Street, Apt 2, Allentown, PA, 18102. Culbreath was identified during this investigation as a methamphetamine, heroin and cocaine distributor. Your affiant determined Culbreath was assigned FBI number 326982DB7, New York State Identification number of 08199812K, and Pennsylvania State Identification number of 35437924.

5. Jerome Lamont Duggan, a/k/a "Rome," (hereinafter "Duggan,") uses telephone (484) 387-3618. Duggan was identified during this investigation as a partner/alternate methamphetamine source of supply for Culbreath. Law enforcement records indicate Duggan

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MAY 05 2016
MICHAEL E. KUNZ, Clerk
By [Signature]
Dep Clerk*

was born on [REDACTED], was assigned a Social Security number of ***-**-5125, and a FBI number of 127497NA9.

6. Erik Ryan Boehm, a/k/a "Rock," a/k/a "Rocky," a/k/a "Rocco" – Boehm is known as a substantial narcotics distributor from other narcotics investigations conducted by local law enforcement narcotics vice units in the Lehigh Valley. Law enforcement records indicate that Boehm has a date of birth of [REDACTED], an FBI number of 587541FB1, and a PA driver's license number of 25029848.

Probable Cause to Arrest

April 18, 2016, Boehm warns Culbreath about arrest of co-conspirator and drug customer of Culbreath's; Boehm wants purchase methamphetamine directly from Culbreath

7. Your affiant has confirmed through law enforcement records that on April 18, 2016, at approximately 8:28 p.m., Erik Boehm and Larry Culbreath had the following conversation. During their conversation, Boehm, who identified himself as "Rocco", explained to Culbreath that DEA has arrested Larry Roger Beitler, Jr. (hereinafter "Beitler"), who is charged elsewhere, and his associate. DEA SA William Rodgers had previously identified Boehm with the assistance of electronic surveillance on Friday, February 26, 2016, which captured Boehm and Larry Beitler meeting in Bethlehem, PA. DEA agents know Boehm uses the nickname "Rock". In the conversation, when Boehm said "you were in my car the other night" and referred to himself as being with "Big L," he was referring to coming with Beitler in Boehm's Honda to purchase methamphetamine from Culbreath. When Boehm referred to Beitler getting arrested "about a month ago," he was telling Culbreath about Beitler's arrest on March 26, 2016, by the Allentown Police Department, who stopped Beitler on Lehigh Street and seized approximately two ounces of methamphetamine from him. Beitler had just purchased that methamphetamine from Culbreath.

Boehm told Culbreath that he would probably be down the next day (April 19, 2016) to purchase one ounce of methamphetamine. Culbreath agreed.

Culbreath: Hello?

Boehm: H?

Culbreath: Who this?

Boehm: It's Rocco, you were in my car the other night. Did you hear me?

Culbreath: Who you was with? Who you was with?

Boehm: I was with, with big L, big L.

Culbreath: Ah... Alright, what's up?

Boehm: Listen, yo, yo, I just got a call, they got... they got the whole crew.

Culbreath: Who?

Boehm: The cops! They supposedly got them. I am up in the mountains, I... I stayed up at the Poconos.

Culbreath: They got who?

Boehm: Larry and Ellie and all of them motherfuckers!

Culbreath: And Ellie... Who's Ellie?

Boehm: Some lady. All I know is a got a phone call, I'm going to get a new number. I got a phone call... I only fuck.., been fucking with them guys for like two (2) months. Okay?

Culbreath: Wha... What?

Boehm: Yeah, I am just letting you know, just... because, you, you do... try to do what I do, so I don't want to see notting' happen to you, I don't even know you like that but I am trying to...

Someone called me and said that they got them at 6:00, this morning.

Culbreath: Word? Aight.

Boehm: Okay, I don't know... Did he try to call you today at all?

Culbreath: Nah.. I ain't speak with him.

Boehm: Okay, well I am just saying, I ain't no... I not a dick head, or nottin' I am just telling you, may be changing...

[Voice Overlap]

Culbreath: No doubt!

Boehm: I'm... I'm maxed [PH] out though, you know, understand? 'Cause I was fucking with him.

Culbreath: Yeah.

Boehm: So I don't know, if it's okay if I... if I call you, I'm not... I don't know what to do, I don't know what to do 'cause he's gone.

Culbreath: Yeah, yeah, I mean, we can do something, you know I mean? We can figure it out.

Boehm: Okay, alright, 'cause listen uh... I'll get at you then and we'll speak, Cause' I'm really doing, I'm doing a lot of foot work out here, I do... You know what I mean? What he gave you the other day, that was all me.

Culbreath: Alright.

Boehm: Alright, I mean there's nothing... Just, just be careful with that... with that shit, cause. I don't know if it's true, but somebody called me and I got good sources and that's what they told me they said 'Yo, they got them they... they hit his girlfriend's house, they took the old man George, uh... and a couple other people, so..."

Culbreath: Damn! What the fuck they get them for? You don't know though? Like it was a raid, or

it was like, it was on him?

Boehm: I don't know... I think it was the big boys... I don't know, I don't know. He got hit um... He got... he didn't tell you he got hit the other? He got hit...

Culbreath: Uh huh [no].

Boehm: He got hit with two [2] things. He told you that?

Culbreath: No!

Boehm: Ah... man like...

[Voices overlap].

Culbreath: For what?

Boehm: ...A month, a month ago.

Culbreath: Like what happened?

Boehm: He got arrested.

Culbreath: For what? Oh he told me...

[Voices overlap].

Boehm: On Lehigh Street.

Culbreath: He told me on Lehigh Street they pulled him over.

Boehm: Yeah, they got him on Lehigh Street and uh... his boy bailed him out uh... like a few days later, and... he's been depending on me... like he's been struggling all the bread that...

Culbreath: What did he got caught with though? What he got bailed on, when he got caught on Lehigh?

[Voice Overlap].

Boehm: He got caught with two [2] things.

Culbreath: Two [2] things of that?

Boehm: Two [2] full things yeah.

Culbreath: Damn!

Boehm: So, just be careful man, I don't know you, but I know... I'm, I'm solid, I'm solid for sure... And you know my man Josh, my man, that's my main.... that's my regular dude. You know what I mean?

Culbreath: Alright, alright bro.

Boehm: He got... he went to rehab, so, I'm just waiting for him to get home, until then this is how I feed myself. You understand what I'm saying?

Culbreath: Alright I got you bro, just hit me. Holla at me alright?

[Voices overlap].

Boehm: So, I'll hit you back.. So, what's the time frame? What's the... What's the, what's the shut off?

[Voices overlap].

Culbreath: There ain't no time frame, any time frame, any time frame, just hit me ahead of time so I can put it together.

[Voices overlap].

Boehm: Okay, okay. Alright, I'll hit you up uh... I'll hit you up in a couple of hours if that's okay?

Culbreath: Yeah just let me know!

Boehm: I'm up at the Poconos! I'm all the way up.

[Voices overlap].

Culbreath: What you might need? What you might... But what you might need?

Boehm: Um, probably... We'll just wait 'til tomorrow.

Culbreath: Yeah, yeah, yeah... yeah
Boehm: I'll probably. I'll start... I'll just get one [1].
Culbreath: Alright, hit me tomorrow.
Boehm: Alright, I'll hit you up later or whatever, I'll hit you tomorrow.
[Voices overlap].
Culbreath: Alright... Alright.
Boehm: So be careful brother, until you get a call from me.
Culbreath: Alright, I got you, I got you.
Boehm: Okay
Culbreath: Good looking bro.
Boehm: Yeah, yeah.
End of Call.

April 21, 2016, Boehm obtains methamphetamine from Culbreath

8. Your Affiant has confirmed through law enforcement records that on April 21, 2016, at approximately 5:56 p.m., Culbreath indicated the following to Boehm: "What's up."

9. Law enforcement records indicate that Boehm and Culbreath had the following follow up conversation at approximately 5:59 p.m. Your affiant believes they were arranging to meet again so Boehm could purchase methamphetamine. When Boehm said he doesn't have a gift for Culbreath, he was referring to not having any additional money.

Boehm: You know I was mad late yesterday?

Culbreath: Uh-hum.

Boehm: And I brought you a gift, well guess what, I don't got no gift today but I'm fucking in the neighborhood, so I'm good to go.

Culbreath: Alright.

Boehm: I gotta go meet my boy real quick, I got to see what the fuck he's got... he does [PH]... fucking [U/I] some dope [PH] so.

Culbreath: Alright, just go to the same place.

Boehm: Okay, I'll call you, I'll call you when I'm 5 minutes straight [PH] from there, okay?

Culbreath: Alright.

Boehm: Alright.

End of call.

10. Your affiant has confirmed through law enforcement records that on April 21, 2016, at approximately 6:16 p.m., Boehm and Culbreath had the following conversation. During

their conversation, Culbreath was attempting to describe to Boehm where he wanted Boehm to meet him. Culbreath was parked on Hamilton Street, one block north of 1246 Walnut Street.

Boehm: Yo, I'll be there in like 30 seconds.

Culbreath: Alright, you know what you do, just park up, you already know.

Boehm: Imma' park and take a walk.

Culbreath: Nah, just park [U/I] don't take no walk, you don't have to take no walk.

Boehm: Oh, I thought you... alright, my bad my bad... I thought I was gonna walk with you again, my bad.

Culbreath: Yeah, you wanna do that but wait until I get there, if you start walking... you know I mean.

Boehm acknowledged.

Parties bid farewell.

End of call.

11. Your affiant has confirmed through law enforcement records that on April 21, 2016, at approximately 6:23 p.m., Boehm and Culbreath had the following conversation. During their conversation, they were still attempting to arrange the meeting location. When Boehm said, "I didn't pay attention to your fucking wheels yesterday," he was referring to not remembering what car Culbreath was operating the previous day.

Boehm: I didn't pay attention to your fucking wheels yesterday, let me know where to walk.

Culbreath: I'm coming up now, I had to go down to 7th, I'm coming in [U/I] right now.

Boehm: I'll chill, let me see what you driving, I'll memorize it so I know what the fuck to look for.

Culbreath: Give me 2 minutes.

Boehm: Alright, alright, I'm by my car, same spot.

Parties bid farewell.

End of call.

12. Your affiant confirmed through law enforcement records that on April 21, 2016, at approximately 6:29 p.m., Boehm and Culbreath had the following conversation. This conversation continues to show they were still attempting to meet.

Culbreath: Yo, where you at?

Boehm: I'm right up here... I'm walking now right?

Culbreath: Walk back towards Hamilton.

Boehm: Alright.

End of call.

13. Your Affiant has confirmed through law enforcement records that on April 21, 2016, at approximately 6:30 p.m., Boehm and Culbreath had the following conversation. Boehm wasn't able to locate Culbreath, so they agreed to meet at the Sunoco at 12th and Hamilton Streets (approximately two blocks from Culbreath's residence). When Boehm said he "almost jumped in with this guy," he was referring to getting into the passenger seat of a DEA surveillance officer's vehicle, thinking it was Culbreath. Trooper Rex said Boehm apologized for trying to get into his car.

Parties disclose each other's whereabouts.

Culbreath: Damn... Go like you going to Sunoco then.

Boehm: Yup, yup, that's what I'm doing, like I'm going to A- Plus... Alright, 'cause [U/I] to fucking, I jumped in a car, it wasn't you, almost jumped right in with this guy [Chuckles].

Culbreath: Alright, let me know.

Boehm: I [U/I] move.

Culbreath: [U/I].

Boehm: Alright,

Culbreath: [U/I] hold on, hold on.

End of call.

April 22, 2016, Boehm orders two ounces of methamphetamine

14. Your affiant has confirmed through law enforcement records that on April 22, 2016, beginning at approximately 6:38 p.m. until approximately 6:42 p.m., Boehm and Culbreath had the following conversation. When Boehm indicated he needed two, he was referring to two ounces of methamphetamine.

Boehm: Ima need 2 dawg.

Culbreath: Im in ny.

Culbreath: Hit u when i get back

Boehm: When u gettin home? Or can i come up.

Culbreath: Im in ny.

Boehm: Ok dawmg.

Culbreath: Hit u when im back.

Boehm: Drive safe.

End of messages.

April 23, 2016, Boehm orders two ounces of methamphetamine from Culbreath, but wants a reduced price for frequent drug purchases

15. Your affiant has confirmed through law enforcement records that on April 23, 2016, at approximately 9:10 a.m., Boehm and Culbreath had the following conversation. During their conversation, Boehm and Culbreath agreed to meet for two ounces of methamphetamine. Culbreath was still in the process of travelling back from New York, according to electronic surveillance.

[Parties greet].

Boehm: Did you, did you call me? I fell sleep though!

Culbreath: Ha? Nah... I'm still on top I'm about to come back out this window, I'm about to roll out in about half a second! It should take about an hour!

Boehm: An hour?

*Culbreath: Yeah... it only takes about an hour n*gga! what you mean? Right there!*

Boehm: Hurry up these motherfuckers are heating me up! Yo! I need TWO [emphasis added].

Culbreath: Aight, I got you bro! I got you!

Boehm: Alright, hurry! hurry! hurry!

Culbreath: Aight!

End of call.

16. Your Affiant has confirmed through law enforcement records that on April 23, 2016, beginning at approximately 1:42 p.m. through 4:45 p.m., Boehm and Culbreath had the following conversation. When Boehm stated the "wolves want meat," he was referring to his methamphetamine customers needing methamphetamine.

Boehm: Whats the word my dude? These wolves want meat yo. Starvin kid. Get at me.

Culbreath: Im back in like 30mins

*Boehm: My n*gga! Im ready 2 go.*

Culbreath: Im a hit u when to come thru

Boehm: Good. Make sure u keep me on the top shelf, ok. Im no slacker. 2 to go and ima need 2 c u later when i get back from the mountains.

Boehm: Im going 2 pick up my laundry and then im free 2 head north. Ima hit u back when laundry in da car. Try n be ready cause i got alot of miles 2 travel today dawg. Its gonna be a beautiful evening

End of messages.

17. Your affiant has confirmed through law enforcement records that on April 23,

2016, at approximately 5:34 p.m., Boehm and Culbreath had the following conversation. During this conversation, Boehm ordered two ounces of methamphetamine from Culbreath and tried to get a break on the price. When Culbreath told Boehm that "You gotta be grabbing like crazy," your affiant believes he meant Boehm had to order significantly more than two ounces if he wanted a price break. When Boehm continued to try and discuss price for quantity, Culbreath told him "I ain't with all that talk on the phone shit."

Culbreath: Yo!

Boehm: Yo, sorry to bother you.

Culbreath: What up boy?

Boehm: I'm trying to get moving, I got all my laundry done, I got everything, I got the food in the crockpot, trying uh...

Culbreath: Alright, I just got to get my shit together real quick. You know I mean?

Boehm: Alright, I'm up top, like near Quakertown. If I head, if I head down to Allentown and... to a bar or somethin', wait for you or whatever.

Culbreath: Alright, then.

Boehm: Pretty soon you think?

Culbreath: Yeah.

Boehm: Alright. What we gonna do and the... on the two [2]? Can you... can you drop it a little bit for me?

Culbreath: What?

Boehm: Can you drop it a little on the two [2]?

Culbreath: Hell no. That shit don't change! That's the low right there, that shit don't change. [Voices overlap].

Boehm: Yeah whatever, you know I'm saying... I [U/I] I think.

[Voices overlap].

Culbreath: That's the low, that... that shit don't change. That shit is not even, negotiable.

Boehm: Hey, I'm just asking, you know.

Culbreath: Hey no... that don't change bro.

Boehm: I'm saying, that you see my work, you'll see my work, you might [U/I].

Culbreath: I'm just saying, that don't, that don't change bro. That don't change, that's not like....

Boehm: Okay. What about?

[Voices overlap].

Culbreath: You gotta be grabbing like crazy.

[Voices overlap].

Boehm: If [U/I] go up a little more.

[Voices overlap].

Culbreath: Yeah, you gotta be grabbing something crazy bro. I don't.

[Voices overlap].

Boehm: Listen, listen, I'm... I gotta, I gotta give you credit though, that [U/I] beautiful [PH].

[Voices overlap].

Culbreath: Listen, listen, man I'm not with all that talk and shit bro. Hear me?

[Voices overlap].

Boehm: No I...

Culbreath: Holla when you see me. Like.

Boehm: Okay.

Culbreath: I ain't with all that talk on the phone shit.

Boehm: Alright, alright, I'll see you in a little bit.

Culbreath: Aight.

End of call.

18. Your affiant has confirmed through law enforcement records that on April 23, 2016, at approximately 5:57 p.m., Jerome Duggan and Culbreath had the following conversation. During this call, your affiant believes Culbreath was ordering methamphetamine from Duggan to supply to Boehm, when said, "cause I got to drop off real quick," and "...if I just came and got it."

Duggan: Yo bro.

Culbreath: Yo. Yo bro, are you in the move yet or are you [U/I] still with it?

Duggan: No I'm about to [U/I] right now. [U/I].

Culbreath: Alright say less, [U/I] not here, [U/I] came back [U/I] cause I got to drop off real quick. I was gonna say if I just came and got it. [U/I] stay still. [U/I].

Duggan: You wanna come [U/I].

Culbreath: I don't know [U/I] ready for me.

Duggan: [U/I] come through then.

Culbreath: Huh?

Duggan: Come through.

Culbreath: Aight say less.

End of call.

19. Your affiant has confirmed through law enforcement records that on April 21, 2016, at approximately 6:18 p.m., Culbreath attempted to contact Boehm twice with no answer; Culbreath then indicated the following to Boehm at approximately 6:18 p.m. Boehm responded to Culbreath at approximately 6:23 p.m.

Culbreath: Yo answer the dam phone.

Boehm: On my way.

End of messages.

20. Your affiant has confirmed through law enforcement records that on April 23,

2016, at approximately 6:25 p.m., Duggan and Culbreath had the following conversation. Culbreath spoke to Duggan to arrange a meeting in Bethlehem so Culbreath could get the methamphetamine from Duggan and provide it to Boehm. Duggan was attempting to direct Culbreath to a meeting spot near Duggan's residence at the Silk Mill Apartments at 238 West Goepp Street, Bethlehem, PA 18018. Surveillance units observed Duggan leaving the Silk Mill apartment complex in the Envoy. Surveillance units observed Culbreath and Duggan eventually meet near the Moravian College Football stadium, at the intersection of East Greenwich and Seifert Streets, Bethlehem, PA.

21. Your affiant has confirmed through law enforcement records that on April 23 2016, beginning at approximately 6:30 p.m. through 6:35 p.m., Boehm and Culbreath had the following conversation. Culbreath was arranging a meeting spot in Bethlehem to meet Boehm, after he met with Duggan to obtain the methamphetamine.

Boehm: On 8th.

Culbreath: Go to kfc on union blvd.

Boehm: Ok.

Culbreath: Copy.

Boehm: U crazy dawg.

End of messages.

22. Your Affiant has confirmed through law enforcement records that on April 23, 2016, at approximately 6:38 p.m., Boehm and Culbreath had the following conversation. Surveillance confirmed Boehm and Culbreath meeting at the KFC following this conversation.

Boehm: Im here. Gettin a sammich.

Culbreath: Be right there.

Boehm: Kk.

Culbreath: Yo lets go.

End of messages.

April 26-28, 2016, Culbreath and Duggan send U.S. currency to source of supply in California for shipment of four pounds of methamphetamine, Culbreath used his residence as return address on parcel of U.S. currency

23. Your affiant has confirmed through law enforcement records that on April 26, 2016, at approximately 8:25 p.m., Duggan told Culbreath that he was going to be outside Culbreath's residence at 1246 Walnut Street, Allentown, PA. Culbreath informed Duggan he would be right out. Moments later, at approximately 8:23 p.m., electronic surveillance observed a black sport utility vehicle, similar to Duggan's GMC Envoy, arrive in front of 1246 W. Walnut St. Surveillance observed Culbreath, empty handed at the time, exit the front door of 1246 W. Walnut Street, and enter the front passenger's seat of the vehicle. The vehicle then left the area, traveling east on W. Walnut Street. At approximately 8:25 p.m., Culbreath was observed walking onto W. Walnut St. from 13th Street, and carrying a black plastic bag in his left hand. Culbreath continued walking on W. Walnut Street and returned to his residence. A black sport utility vehicle, similar to Duggan's GMC Envoy, was observed stopped at the intersection of W. Walnut St. and 13th St., just prior to Culbreath walking onto W. Walnut Street. The following law enforcement records show that this during this brief meeting between them, Duggan provided Culbreath with U.S. currency to purchase methamphetamine from Person #1.

24. On April 26, 2016, at approximately 9:36 p.m., law enforcement records indicated Culbreath spoke with one of his methamphetamine source of supply (identified for the purpose of this affidavit as "Person #1"). Your affiant believes that the below conversation clearly defines the drug distribution relationship between Culbreath and Person #1. The conversation clearly indicates prior methamphetamine transactions from Person #1 to Culbreath, including a "whole one and half" from a paid for delivery. The conversation outlines a present agreement and timeline for Culbreath to purchase four pounds of methamphetamine from Person #1 for \$16,500.

Culbreath: Yo!

Person #1: Yo!

Culbreath: What are you saying... I don't understand yo' I'm lost yo' I'm definitely lost! What were you saying bro?

Person #1: [U/I] Yeah... let me cut this T.V, Bro' I'm, what I'm saying you said to send you an extra one, bro, but I am in a tight situation right now like...

Culbreath: Bro' listen, think about this bro, just think about this! This is you thinking about some stuff! Listen! You know how much money we lost bro? Listen to me! We never received the WHOLE ONE AND HALF [emphasis added], you know the [U/I] and the cash or come up... [Voice Overlap].

Person #1: I would have money in my pocket and I would it send it with my own money!
[Voice Overlap].

*Culbreath: This is what I'm trying to tell you bro! This is what I'm trying to tell you! I am scrounging up everything my n*gga! And I took a losses after that, on top of not receiving, what I was supposed to get that I paid for!*

Person #1: Yeah, but the losses what nothing to do with me dawg...
[Voice Overlap].

Culbreath: What? Bro you have to listen, you got paid! How you are going to say that! You send something that I never received!

Person #1: After that, I'm saying your losses after that!
[Voice Overlap].

Culbreath: No I'm talking about, no I ain't talking about my loses after that, I ain't talking after! I said you send me something that I never received, HALF OF IT [emphasis added]! How are you going to say that you have notting' to do with it? You know how much money that was?

*Person #1: Bro, you are not hearing me bro! I can't send shit if I don't have it! [Laughs] N*gga if you send me that! W... what I told you to send me, I can't send you no extra one bro, if I can buy it that is what I'm trying to tell you! I don't have it! I'm fucking down over here!*

*Culbreath: Like what? Tell me, tell me? What's going on like? I'm trying to figure out a couple of dollars, but n*ggas don't want to fuck with you because they are saying 'why would we' Listen! Listen! This is what there thing is.*

[Voice Overlap].

Person #1: [U/I].

Culbreath: They are saying 'how can we keep sending bread over there if is not getting back' you know what I'm trying to tell you?

Person #1: I don't know if they are fucking with me bro! If you are going through me!

Culbreath: This are my folks! What you mean? My folks is my folks! Just like you is my folks! They my folks! You don't think they don't know what I'm doing? Their money was involved in that bro'! You [U/I] that is what I'm trying to tell you! You got me in a bad situation when you did that!

Person #1: That wasn't my... you are not hearing bro'!

Culbreath: I ain't tripping over that, but I'm just saying that we have to fix that bro! We still have to fix it!

Person #1: And I am trying to help you! You are not hearing bro'! You are not hearing because you just won't.

[Voice Overlap].

Culbreath: No you have to listen to me! Is not making sense what you said over the text, that is why

I am conversationing you! Don't make sense what you said!

Person #1: Again, those text [U/I] and I just got that [U/I] bro! I'm not getting no money out of that, by helping you with that situation, you give me SIXTEEN is FOUR TIME FOUR IS SIXTEEN [emphasis added] bro ! That extra five hundred [500] bro I am just using that to [U/I] bro, I am not making...

[Voice Overlap].

Parties have discussion regarding pills.

Culbreath: So listen with the 16.5 you can get the 4 to me for 16? I shoot it back to you right back to you!

Person #1: Nah... I can't do that brother! I'm not get nothing! [giggles] You are not hearing me!

Culbreath: It's only a (5) Five difference! It's a nickel difference.

Person #1: [U/I].

Culbreath: I'm gonna send it right back to you! When I grab them joints!

Person #1: I don't have no money, I have \$ 45.00 dollars in my pocket bro and I have [U/I] here bro' and I have to keep some kind of money in my pocket.

Culbreath: Listen today is Tuesday and you are slowing up the process I need this shit to move tomorrow man! So we can get this shit the same week!

*Person #1: Was is an extra five hundred to yo' n*gga!*

*Culbreath: Bro you are not listening ! N*gga you know what I had to do to turn it! Think about it I just conversation you in! For this! When I just told you I was gonna put it together? I been putting it together, I know this n*gga! Stop playing man! How can you tell me that?*

[Voice Overlap].

Person #1: I was going to try to do you for the 48 [\$4800] bro so I can take 7 out of those 3 that is \$2100 bro that just not getting shit done!

Culbreath: What do you mean? What do you mean? Explain that?

[Voice Overlap].

Person #1: Some type of way?

Culbreath: What do you mean? What do you mean?

Person #1: You remember I said 'I am gonna do you for the 48 for which ever you get but if you want a WHOLE ONE [emphasis added] thrown on top of that you have me to give me 55 in order for me to get the FOUR [emphasis added] of them so I can send it to you!

Culbreath: So the (48) forty eight is for what?

*Person #1: The forty eight is just for the forty eight just for n*gga... if you want to try to get a whole one or if you just try to get the two of them, you get the 48 for either one to knock of that seven by like I was saying... so... you can keep that money in your pocket like!*

*Culbreath: Yeah! Look at the benefits! its three [3] or four [4] man, that is what I'm trying to tell you... I am working crazy n*gga! I am running crazy kid!*

Person #1: You are not hearing bro'!

*Culbreath: I am hearing you my n*gga! It's only five [5] difference I'll come up with that but...
[Voice Overlap].*

Person #1: That is not coming from out here!

Culbreath: Listen! Bro! I got it! Bro' you are not listening! I fuck with you because I fuck with you! My peoples don't want fuck with you, and they only fuck up with you because of business! I don't

fuck with you because of business, I fuck with you because I fuck with you bro'! Even if do business or not I am still going to fuck with you! You understand what I'm trying to tell you?

Person #1: Yeah!

Culbreath: So when they be ready to grab, I am like 'Nah' instead of going to the folks we been going to, I'm bout' to go to my folks! So they then get that! You know what I'm saying, that is what I been conversationing you like that, hitting you like out of nowhere. Bum dawg they need that because they are ready to grab that. I am like 'No! don't go to they folks that we got! We are going to go through here' You know what I'm saying?

Person #1: Yeah!

[Voice Overlap].

*Culbreath: So you can [U/I] my n*gga! You know what I'm saying?*

Person #1: I live the day to day bro! I have [U/I] you already know, because we already discuss this before all this shit happen! A loss is a loss bro! I am just trying to help you out bro! On me!

Culbreath: Is the only thing you could bro' We lost! We didn't get nothing! We didn't gain!

Person #1: If ya' don't let me help you this shit would never be fix.

*Culbreath: Bro Mad time just passed by, that is all we can try do! I mean listen! Is harder to gain when we lose so much! In one shot my n*gga!*

Person #1: Bro I Already know get it from P for the thirty eight (38) bro, you thrown an extra stack on top [U/I] cause ' he didn't tell that he find it for the thirty eight (38) I was trying to help you...

*Culbreath: I got it from lower than that! That is from [U/I] thirty (30) I got it from thirty seven (37) n*gga! Thirty six (36)!*

Person #1: That's cool, that's cool!

[Voice Overlap].

Culbreath: I don't even go to bros' when bro's' trying to make a move, I don't even deal with bro like that, when he is trying to make a move and what something happen, Imma might holla' with something! besides that I don't [U/I] that is just a bro!

Person #1: [U/I] I been trying to tell you!

[Voice Overlap].

*Culbreath: Listen that is what I'm trying to tell you! Listen what you said to me! Why would I want something that is so-so... I don't want nothing that is so-so my n*gga, everything I grab is fire! If ain't fire I don't even want it! That is waste of time! Straight up I don't even waste my time!*

Person #1: But if that is fire that is cool! But I guaranteed you what he got ain't what I'm getting bro! I already know who P...

*Culbreath: My n*gga! I got fire! What do you mean? If its fire the p... listen the fuck what I'm saying! The peoples that we give these to, want's these! It's fire! You are not listening! They are saying 'keep these, this is the weight.' Why would I change it? Why would I got against that?*

Person #1: Yeah!

*Culbreath: It's not me! It's not me n*gga! I don't use it! I'm not an user! Imma a consumer!*

Person #1: Yeah but I tell you, thou' you come and get this shit [U/I] right here!

[Voice Overlap].

*Culbreath: I feel you but it still got to make sense to me! I'm not gonna... It has to make sense my n*gga that is what I'm saying!*

*Person #1: [U/I] N*ggas! That is the best I can get! I can get no better deal than that! [Giggles].*

Culbreath: [Laughs] I got to come back over there with you man so I can make a better deal for you! That is what I'm trying to tell you bro!

Person #1: N*gga you can get a better deal of that shit [U/I] ...

Culbreath: A better number! We just need a better number! Bro' you need a better number! Bro' you need a better number!

Person #1: How the process is going they are looking at that like 'shit! my business ain't no good business because the money it's going down.'

Culbreath: That is what I'm trying to tell you! That's why you need... That's why you need a better number, that's what I'm trying to tell you it's slowing down because it ain't the right number! You see what I'm saying that is why you need a better number, you need to start shopping to get a better number my n*gga!

Person #1: [U/I].

[Voice Overlap].

Culbreath: Everything is going to be better when the numbers get better my n*gga' you know that!

Person #1: I can't get FIRE for you, that's nothing bro!

[Voice Overlap].

Culbreath: I need fire, ain't no... Listen it got to be fire! If it is not fire I don't want it!

Person #1: Everything I gave you bro' have you ever been bad?

Culbreath: No, one (1) did, one shit was trashed! you know that! Remember? The other shit, the other shit! It was trash, remember I told you that!

Person #1: Which one?

Culbreath: Them shit, it was a little bit shaky and then there was a couple of boulders! Remember when we had the three (3) joints... like the second time, the second go around when we grabbed three (3) joints!

Person #1: I don't even remember that I'll probably... [U/I]

[Voice Overlap].

Culbreath: That shit is like weak, remember I tell you that took us mad long to get rid of it... besides that everything is good! you know that! You know what I'm saying everything is good besides that bro! You know I don't play it like that! Come on man! I'm just saying... you know what I mean? We just need a better number because we got a better number! You know what I'm saying?

Person #1: [U/I] I can get fire from you bro!

Culbreath: I already know bro! this is what I am trying to tell you when it comes to... when it come to where my peoples are saying, I'm telling you are my people, so I don't care, you understand what I'm saying? I fuck with you they don't really have to fuck with you! You see what I'm saying?

[Aside: What's up Mami? What's up Mami]

Person #1: [Laughs]

Culbreath: fuck with you so I don't care bout'... since I fuck with you when I'm trying to make something, I'm gonna make it happen but they still have to believed in my n*gga! And the only way they are going to believe in me, is if you come trough and show me... not even show me but come through and show like you are, who you are supposed to be! You dig what I'm saying?

Person #1: [U/I]

Culbreath: Remember when I told you, I told you... I speak big of you! "This is the boy, the glove, he make it happen! Whatever he need you are gonna get it ah...." you see what I'm saying?

Person #1: Yeah!

Culbreath: So I got, I got... you see what I'm saying? You know come on bro! this is the east coast, n*ggas ain't just passing lump sums of money bro' you know that?

Person #1: Yeah.

Culbreath: You know what I'm saying? They got to believed! First of all, n*gga's! know who I am so its low... [U/I] those are my folks, they are straight! See what I'm saying? So my word! n*gga's are like "Are you sure?" yeah I'm sure! It's my n*gger! I been with him around and that like [U/I] I meet him face to face and I fuck's with him!

Person #1: Yeah!

Culbreath: You know what I'm saying? Like you see what I'm saying? That is why I am telling you that we have to make this shit work! Because that's what keeps it flowing... we have to keep the money flowing, we have to keep the flip flowing!

Person #1: I am trying to help you...

[Voice Overlap].

Culbreath: I'm trying... Imma working bro' Listen! This is what I'm gonna do, Imma gonna get the sixteen five [\$16,500] Imma gonna have at you...

Person #1: [U/I].

Culbreath: Ha? Imma gonna have them at you by tonight bro! I'm going to have the sixteen five [\$16,500] by tonight! Imma gonna have that sixteen five [\$16,500] by tonight! But I am just telling you I am under pressure n*gga! I'm under pressure n*gga!

Person #1: [laughs].

Culbreath: That's your boy it's your buy [U/I]... I'm under pressure n*gga!

Person #1: Yeah me too bro! I ain't mad at you, I am just trying to help you!

Culbreath: I took Mad loses bro! I took them back to back at the same time type shit that's what happen bro see what I'm saying? That's old! I took too many loses at the same time. Both losses [stutters] the situation losses.

Person #1: We probably took the same losses bro!

Culbreath: My n*gga I am trying to something explain to you some cra... some wear shit going on bro'! I guess is getting freaky! You know how that shit go bro'! That is part of the game, I ain't be tripping really! I understand this shit but is like at time... it's about timing my n*gga! This shit is killing me!

Person #1: [Bad audio] [U/I] the situation... [U/I]

Culbreath: You already know I'm coming back out there to fuck with you [U/I] and Charles N*gga!

Person #1: I know.

[Culbreath: indicates that he wants to go hang with him before it becomes too hot].

[Person #1 indicates that he would be planning about June or July].

Culbreath: This is the thing... this is the thing... this is what I am trying to tell you, this what I was trying to explain to you this is the movement right now, I swear to you bro! They [U/I] don't want the BOULDERS NO MORE THEY WANT THE SHARDS! [emphasis added].

Person #1: Yeah!

Culbreath: You understand me?

Person #1: That shit [U/I]...

[Voice Overlap].

Culbreath: Them sickles, them sickles, the pointy shit!

Person #1: Say what?

Culbreath: Like the sickles, like that pointy, you know how it used to be all jagged and all of that!

Person #1: Hey but that is what I'm saying bro! You are talking like the clear, clear shards, like

the ones like glass?

Culbreath: That's it right now! That's it!

[Voice Overlap].

Person #1: That's what I'm getting.

[Voice Overlap].

*Culbreath: My n*gga! So you have to get a better number! You have to be able to get a better number, they guy order it for thirty six (36) my n*gga hard thrown, they got it over here, wax all my n*gga! That is what I'm try to say.*

[Voice Overlap].

Person #1: I'm sorry bro! I'm promise you what I got right now, they don't got over there bro! I'm sorry.

*Culbreath: My n*gga this is it! I swear to you...*

[Voice Overlap].

Person #1: The MEXICANS [emphasis added] right now, they don't even fuck with black people bro!

*Culbreath: My n*gga who you think I am getting it from n*gga? This ain't no fucking n*gga! You know we don't got it n*gga!*

[Voice Overlap].

Person #1: Oh I'm thinking you told me...

[Voice Overlap].

*Culbreath: Come on man, I ain't talking about no n*ggas! I am talking about the fucking MEXICANS [emphasis added] n*gger! You don't fuck with n*ggas for this shit my n*gga!*

Person #1: Hello no!

*Culbreath: I would not even by this shit from no n*ggas! I ain't dumb bro!*

Person #1: [Laughs].

Culbreath: Come on man! I am straight!

Person #1: [Laughs]

Culbreath: Your boy [U/I] man... Ah... listen man, I'm gonna get that together man! You understand? But this is what I need you to do! This is what I need you to do! You got make sure that shit is it bro! It can be no...

[Voice Overlap].

Person #1: [U/I]

Culbreath: The way I got right now... listen! Everything is depending on this right now. I am depending on everything to come through and on the new... like they are just behind me right now... like 'Yo you up right now!' But they don't even know that I lost! You see what I'm saying?

Person #1: Yeah!

Culbreath: So, this is why I needed to come through right now, because I don't have notting' no more! You see what I'm saying?

Person #1: On top!

Culbreath: I don't have shit! You see what I'm saying? So now I have to comeback with what they know is there already so I can... it can be different... see what I'm saying? That's what I'm trying to tell you bro' they got to be it! It has to be it bro!

Person #1: Yeah... [U/I].

Culbreath: You dig? You dig what I'm saying?

Person #1: That situation [U/I] on top...

*Culbreath: I get you the sixteen five [\$16,500] bro you know I fuck with you, I always work for you, bro that is what I am trying to tell you, it just be timing my n*gga!*

Person #1: You know...

[Voice Overlap].

*Culbreath: This will be timing my n*gga! Come on man! You know I'm always going to fuck with you bro! You got tell me what's going on!*

Person #1: So what that motherfucker!

[Voice Overlap].

*Culbreath: N*gga I was just ready to get out there, when you send me those pictures, I was about to send somebody out there.*

[Culbreath stated that he was going to help Person #1 when he has the situation with his grandmother with his young bulls because Person #1 is like family for him].

[Culbreath told Person #1 to find out about the Rolex's and the Dolphins and they will grab a rack from him].

Person #1: So this shit should be here like Friday!

*Culbreath: I am sending out in the morning n*gga! You know I won't be playing! Right in the morning, I will right with you my n*gga!*

Person #1: I was thinkings...

[Voice Overlap].

Culbreath: You got it right back!

End of conversation.

25. On April 27, 2016, at approximately 10:14 am, physical and electronic surveillance observed Culbreath at the US Post Office, 442 W. Hamilton Street, Allentown, PA. Culbreath was observed in possession of a black bag, similar to the one in his possession on April 26, 2016, after meeting with Duggan. Physical and electronic surveillance verified Culbreath mailed an envelope at the location.

26. Your affiant contacted USPI Herzog and informed him of the matter. USPI Herzog confirmed Culbreath had mailed an envelope. USPI Herzog reported the envelope was addressed to Person #1, 1501 Miramar St. #309, Los Angeles, CA 90026. USPI Herzog reported the return address on the envelope was Larry Culbreath, 1246 W. Walnut St., Allentown, PA 18102. USPI Herzog reported the envelope tracking number as 9505.5105.5045.6118.3467.19. Your affiant knows from the above conversation that Culbreath mailed Person #1 \$16,500 at this time.

27. On April 28, 2016, between approximately 1:43 p.m. and 1:46 p.m., law enforcement records show the following conversation between Culbreath and Person #1. Your affiant knows the number provided by Culbreath to Person #1, in the message listed below, was the USPS tracking number assigned to the envelope mailed by Culbreath to Person #1.

Person #1: I need the numbers by the way.

Culbreath: 9505.5105.5045.6118.3467.19.

End of messages.

28. Also on April 28, 2016, law enforcement records show the following conversation between Culbreath and Erik Boehm, a/k/a "Rock." Boehm was identified as a multi-ounce methamphetamine customer of Culbreath during this investigation.

Boehm: How we lookin for today? This evening?

Culbreath: I'm trying

*Boehm: My n*gga. Just let me know*

Culbreath: Copy.

End of messages.

29. During the conversation above, Boehm is inquiring as to whether Culbreath will have methamphetamine later that evening. Your affiant knows at the time of their conversation, Culbreath and Duggan did not have any methamphetamine, and had just invested \$16,500 in a shipment from Person #1 (described above). Culbreath and Duggan talked later that same day and Duggan confirmed he had nothing either. At approximately 1:47 p.m. on that same date, law enforcement records show that Culbreath provided the USPS tracking number to Duggan in a text according to law enforcement sources, and this number was for the USPS parcel containing the \$16,500, based upon the above described Person #1/Culbreath conversation. Your affiant believes Culbreath provided the number to Duggan as well as Person #1 because a large portion of the money was Duggan's.

April 30, 2016, Person #1 has 3 pounds of methamphetamine to mail, not 4

30. On April 30, 2016, the following series of messages occurred between Person #1 and Culbreath.

Culbreath: Make sure...that glasshouse fire.

Person #1: I'm here with my boy now. He only got 3.

Culbreath: What I need 4.

Culbreath: You knew that.

Culbreath: So get the otha one...

Person #1: Bro stop coming at me like that fr [for real].

Person #1: I just said that.

Culbreath: Cut it out.

Person #1: I'm just keepin you updated.

End of messages.

31. During the text messages, Culbreath was asking for Person #1 to make sure the methamphetamine was of a good quality when he said “make sure that glasshouse fire.” Person #1 then explained his source only had three pounds. Culbreath was not happy because he requested four pounds.

May 1, 2016, Person #1 can only get an extra ½ pound of methamphetamine to add to the 3 pounds, Culbreath asks him to make up difference with either marijuana or pills

32. Law enforcement records show the a follow up conversation occurred on May 1, 2016, at approximately 1:15 p.m., when Person #1 indicated to Culbreath, “*All the other are sold. He said he bout to conversation his other boy and see if he got some, but push come to shove he got like a lil over a half left and I can add a couple oz out of my stash if possible. Other than that he can get the non-shattered kind.*” Culbreath responded, “*Copy lets get it,*” and “*If u cant make up for the rest with some loud or pills.*” Your affiant knows from his experience that “loud” was a coded reference to marijuana and in the conversation above, Person #1 agreed to provide over three pounds of methamphetamine to Culbreath.

May 2, 2016, Person #1 can't get last ½ pound of methamphetamine, so he is adding 6 ounces to the 3 pounds, and also mailing ¼ pound of marijuana

33. Law enforcement records show that at approximately 2:05 p.m., Person #1 indicated to Culbreath, “*Skittles didn’t come through, but I got you a QP of some Private reserve OG. Dude didn’t even have a whole half and he was tryna tax me so I sent you my last 6 oz and kept the change in my pocket. Made more sense.*” Your affiant knew this was confirmation Person #1 had not gotten the pills (“skittles”), but had obtained a quarter pound of marijuana (“QP of some Private”) for Culbreath in addition to the original three pounds of methamphetamine and six extra ounces of methamphetamine from Person #1’s “stash.”

34. Law enforcement records show that also on May 2, 2016, at approximately 4:29 p.m., Culbreath indicated to Boehm, “*We gonna be good this week heavy with it.*” Your affiant knew this was a reference to Culbreath obtaining the three plus pounds of methamphetamine from Person #1, and advising Boehm to be ready to purchase it.

May 3, 2016, Person #1 sends parcel of methamphetamine and marijuana to Culbreath

35. Law enforcement records show that on May 3, 2016, at approximately 7:48 a.m., Person #1 indicated to Culbreath the following confirmation of the tracking number for the USPS parcel, “9505513009226123405105.” Your affiant determined this parcel was shipped from Los Angeles, CA, on May 2, 2016, weighed approximately 10.19 pounds, and was destined for 1246 W. Walnut Street, Allentown, PA 18102.

May 4, 2016, USPS seizes parcel of methamphetamine and marijuana addressed to Culbreath

36. On May 4, 2016, the Philadelphia Division of USPIS identified a suspect U.S. Postal Service priority mail parcel, bearing priority mail number 9505513009226123405105 (the “Subject Parcel.”). That parcel has the following characteristics:

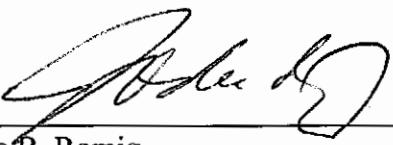
Parcel Description:	9505513009226123405105 17.75" x 16.5" x 18.25" 10 pounds, 3 ounces
Return Address:	Frederick Person #1 1501 Miramar ave #309 LA, CA 90026
Delivery Address:	Larry Culbreath 1246 Walnut St. Apt#2 Allentown PA 18102

37. On May 4, 2016, at approximately 3:30 p.m., a Federal search warrant was obtained for the above Subject Parcel. USPI Herzog and your affiant recovered the following controlled substances from the parcel: three vacuum sealed packages each containing a crystal like substance, weighing approximately 455, 456, and 454 grams each (for a total weight of approximately three pounds), a smaller vacuum sealed package of a crystal like substance that weighed approximately 174.3 grams (or approximately 6 ounces), and a vacuum sealed package of suspected marijuana that weighed approximately 129 grams (approximately a 1/4 pound). Your affiant field tested a small amount of the crystal like substance from one of the three pound bags (as witnessed by USPI Herzog) and observed a positive result for the presence of methamphetamine. USPI Herzog processed the suspected methamphetamine and marijuana as evidence for submission to the USPS laboratory for further analysis.

38. Law enforcement sources confirmed Duggan and Culbreath spoke on May 4, 2016, about the package of methamphetamine not arriving on May 4, 2016. Culbreath in summary told Duggan that he had been waiting all day for the package and stated it was "here," but he was not in possession of it at that time. Duggan acknowledged and used coded language stating that he had obtained some extra methamphetamine from a different source because of the delay.

Conclusion

39. Based on the information above, I have concluded there is probable cause to believe that Jerome Lamont Duggan, a/k/a "Rome," Larry Haywood Culbreath, Jr., a/k/a "Harlem," and Erik Ryan Boehm, a/k/a "Rock," a/k/a "Rocky," a/k/a "Rocco" conspired and agreed with others known and unknown, to knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in and around the Cities of Allentown and Bethlehem, Lehigh and Northampton Counties, the Eastern District of Pennsylvania, in violation of 21 U.S.C. § 846, 841(a)(1), (b)(1)(A).



Joshua B. Romig
Special Agent
Drug Enforcement Administration

Subscribed to and sworn before
me this 5th day of May, 2016



HONORABLE HENRY S. PERKIN
United States Magistrate Judge